

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MATTHEW BREDDER,

Plaintiff,

**NOTICE OF MOTION**

-against-

22-CV-4293 (VSB)

THE CITY OF NEW YORK, NYPD CAPTAIN JULIO  
DELGADO; NYPD OFFICER JUSTIN SCHIVEK; AND  
NYPD MEMBERS JOHN AND JANE DOES 1-6,

Defendants.

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**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Transfer Venue, dated September 1, 2022; and upon all prior pleadings and proceedings had herein, Defendants the City of New York, Captain Delgado, and Police Officer Schivek will move this Court, before the Honorable Vernon S. Broderick, at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, on a date to be set by the Court, for an order pursuant to 28 U.S.C. § 1404(a) transferring this action to the United States District Court for the Eastern District of New York, together with such other relief as the Court may deem just and proper, on the grounds that this action should have been brought there, and the balance of convenience and justice favors transfer.

Pursuant to Local Rule 6.1(b) of the United States District Court of the Southern District of New York, plaintiff's opposition to this motion, if any, shall be served by September 15, 2022, and defendants' reply, if any, shall be served by September 22, 2022.

Dated: New York, New York  
September 1, 2022

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Julio Delgado, and Police Officer Justin Schivek*  
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By: *Jennifer Goltche*

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Jennifer Goltche  
Senior Counsel  
Special Federal Litigation Division

To: BY ECF  
*All Counsel of Record*